

EXHIBIT 3

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Case No. 1:19-cv-00477-CCE-LPA**

THE ESTATE OF NAJEE ALI BAKER,
by and through his Ancillary
Administrator, Jemel Ali Dixon,

Plaintiff,

v.

WAKE FOREST UNIVERSITY, a North
Carolina non-profit corporation and
institution of higher education; *et al.*,

Defendants

AFFIDAVIT OF DR. ADAM GOLDSTEIN

DR. ADAM GOLDSTEIN, first being duly sworn, deposes and says as follows:

1. I am over the age of 18 and under no disability. I have personal knowledge of the matters set forth herein, unless otherwise indicated.

2. I am employed as the Associate Vice President for Campus Life and Dean of Students at Wake Forest University ("WFU"). I have held that position since July 2014. Prior to taking this position, I served as the Associate Dean of Students at Florida State University. Before that, I worked for Drexel University as the Director of Campus Activities and Assistant Dean for Student Life. I have also previously worked for Georgia Southwestern University, where, at the time of my departure, I was the Director of Student Activities. I have more than 27 years of experience in college administration, including event management experience.

3. As the Associate Vice President for Campus Life and Dean of Students at WFU, I am responsible for working with the Vice President for Campus Life on issues relating to the Division of Campus Life. I represent the Division of Campus Life on various committees at WFU. I also provide administrative oversight to the Office of Student Conduct, Office of Student Engagement, CARE and Case Management, the Intercultural Center, the Office of Civic and Community Engagement, and Campus Life Finance and Operations.

4. The Barn is a social event venue on WFU's main campus that opened in 2011 as a place for student organizations to host social functions. The Barn has a capacity of more than 500 people.

5. Student groups routinely used the Barn for parties. Member organizations of the National Pan-Hellenic Council ("NPHC"), which includes WFU's historically-Black sororities and fraternities, hosted parties at the Barn for fundraising purposes.

6. NPHC organizations at WFU typically had few members and lacked the resources to maintain a dedicated space for social events on campus. WFU permitted the events at the Barn because the events supported the NPHC organizations and fostered social development and activities for WFU's Black students.

7. While student organizations could obtain permission to serve alcohol at Barn parties, alcohol was prohibited at all NPHC parties pursuant to a policy of the NPHC national organization.

8. Office of the Dean of Students ("DOS") staff and I worked with Wake Forest University Police Department ("WFUPD") staff, including Chief Regina Lawson and

Special Events Sergeant James Gravely, to design and implement a staffing plan that would facilitate well-managed and safe Barn events. Under this new plan (“the Hybrid Approach”), we used a combination of the following staffing for Barn parties:

- a. WFUPD sworn officers (in addition to other officers nearby on campus);
- b. Professional security officers from Rhino Sports & Entertainment (“Rhino”);
- c. University-employed and trained students called Event Resource Managers (“ERMs”);
- d. Student hosts from the student organization hosting the event;
- e. Advisors for the student organization hosting the event; and
- f. DOS staff members.

9. On the evening of January 19–20, 2018, Delta Sigma Theta (the “Sorority”) hosted the “Level 1913” party (the “Party”) at the Barn. The Sorority used social media to advertise the Party to WFU students and non-WFU students in the surrounding area.

10. Consistent with the Hybrid Approach, WFU provided the following staffing for the Party: WFUPD Officer Michael Bottoms, seven licensed private Rhino security officers, six ERMs, two Sorority hosts, four Sorority Advisors, and one DOS staff member.

FURTHER, Affiant sayeth not.

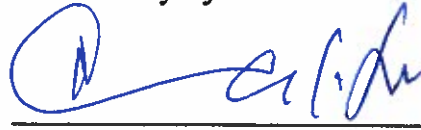
This the 26 day of May, 2021.


Dr. Adam Goldstein

forsyth County, North Carolina

Signed and sworn to (or affirmed) before me this day by Adam Goldstein.

Date: MAY 26, 2021
Notary Public





TEJINDER SANGHA
Printed Name of Notary Public

My commission expires: MAY 22, 2026